State of Kansas Joan Finney, Governor



Department of Health and Environment

Robert C. Harder, Secretary

Reply to:

South Central District Office 1919 N. Amidon, Suite 130 Wichita, Kansas 67203 Phone: (316) 838-1071 Fax: (316) 838-0042

December 16, 1992

Mr. Steve Keiter Hydrocarbon Recyclers, Inc. 2459 N. New York Wichita, Kansas 67219

Re: Hazardous Waste Compliance Inspection
EPA Identification Number: KSD007246846

Dear Mr. Keiter:

I have received Ron Robertson's letter of October 9, 1992. Based on the information provided, the violations addressed in my letter of September 15, 1992 to you have been corrected.

As a reminder, if you are unable to dispose of the mercury waste you are storing by May 6, 1993, you need to demonstrate and document your purposes for storing this waste greater than one year past the land disposal restriction effective date.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning the inspection, please call me at 316/838-1071.

Sincerely,

Teresa Hansen

Inspections and Enforcement Section

Bureau of Waste Management

TH:ajw

pc: Mike Tate, BWM, Topeka

John Mitchell, BWM, Topeka

SCD-File







October 9, 1992

Teresa Hansen, Inspections and Enforcement Section Kansas Department of Health and Environment 1919 N. Amidon, Suite 130 Wichita, Kansas 67203

Re: Hazardous Waste Compliance Inspection of July 28, 1992

Dear Ms. Hansen:

This letter addresses the issues raised in your letter of September 15, 1992, concerning the above inspection of this facility.

Items of alleged non compliance:

- Copies of the current Contingency/Emergency Plan, including the list of current emergency coordinators, were submitted to local authorities on October 1, as required.
- 2. The facility training coordinator received formal training during the week of October 5 through October 8, 1992. Documentation will be provided for the facility training files.
- 3. The drums alleged to not be in good condition were repackaged in proper containers on July 28, 1992.

Other issues:

With respect to other issues specifically mentioned in your letter, HRIW provides the following responses:

Hydrocarbon Recyclers, Inc. of Wichita (HRIW) is not a marketer of hazardous waste fuels as defined in 40 CFR 266. HRIW pays one or more marketers for the disposal of blended wastes. These marketers distribute fuels to the burners.

HRIW hopes to find suitable disposal before May 6, 1993 for the mercury wastes (U151 and D009) which we have held more than one year. HRIW is storing this material because we are unable to find a contractor capable of providing environmentally safe and proper recovery, treatment, and/or



disposal for this mixed U151/D009 material. HRIW is still pursuing a suitable contractor, and will arrange disposal of this material at the earliest possible date.

The secondary containment of the container storage areas in Buildings C and D is being repaired to eliminate any cracks or gaps. HRIW anticipates that this work will be completed by November 15, 1992.

Facility policy, training, and inspections ensure that drums be placed so that labels and markings can be easily seen. Misoriented drums are corrected through our Remedial Work Order procedures.

The use of "Non Hazardous Waste" labels for general identification has been discontinued. Facility personnel have been instructed in the proper identification and labeling of product and other materials not regulated under RCRA.

Land Disposal Restriction documents associated with incoming wastes are checked on receipt for completeness. Where necessary, reference to the associated manifest will be made on the documents.

Please call me at (316) 268-9490 if you have any further questions.

Sincerely,

Ronald K. Robertson

for

Steve Keiter

Facility Manager

cc: Azzie Young, KDHE

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Hazardous Waste Compliance Monitoring and Enforcement Log

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Hazardous Veste Compliance Monitoring and Enforcement Log

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